

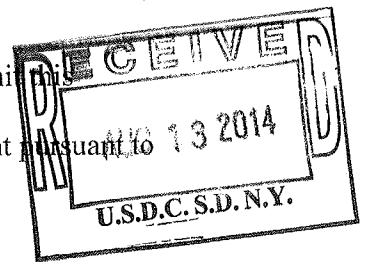
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

14 MISC 258

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In re Application of THE COALITION TO PROTECT : Case No. 14-MC ____
CLIFTON BAY and LOUIS BACON for an Order :
Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for : DECLARATION OF
Use in Foreign Proceedings. : LOUIS M. BACON
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I, LOUIS M. BACON, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an Applicant in the above-captioned action. I respectfully submit this declaration in support of my application for discovery from Stephen Feralio, brought pursuant to 28 U.S.C. § 1782 ("Section 1782 Action").



2. I am the Chairman and Chief Executive Officer of Moore Capital Management, LLC ("MCM"), a private investment management firm headquartered in New York City with additional offices in Washington D.C., London, and Hong Kong. I founded MCM in 1989.

3. I am a member of a number of corporate and university boards and organizations, including the Board of Trustees of Middlebury College; the Board of Overseers at Columbia Business School; the Leadership Council of the Center for Public Leadership at the Harvard Kennedy School of Government; the Investor Advisory Committee on Financial Markets of the Federal Reserve Bank of New York; and the Board of the Foreign Policy Association.

4. In or about 1992, I founded The Moore Charitable Foundation, which provides support to non-profit organizations focused on land and water conservation, and community organizations including educational and medical non-profits in the United States, the Bahamas and Panama. I have also since founded The Moore Bahamas Foundation, an affiliate of The Moore Charitable Foundation, to support environmental education and advocacy organizations in

the Bahamas. The Moore Charitable Foundation and its six affiliate foundations have supported more than 200 conservation non-profit organizations.

5. In 1999, I founded the Waterkeeper Alliance with Robert F. Kennedy, Jr. and Ted Turner's Foundation. The Waterkeeper Alliance has grown to 200 Waterkeeper advocacy organizations worldwide campaigning for the defense of clean water, energy, and family farms.

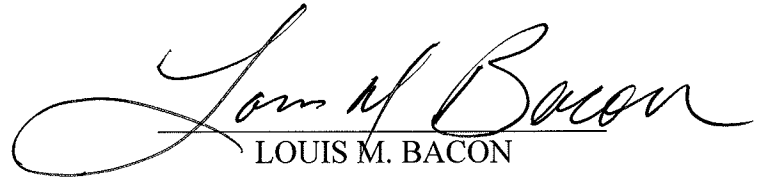
6. I am also a founder and director of the Coalition to Protect Clifton Bay, now commonly referred to as "Save The Bays." Save The Bays is a non-profit environmental coalition, founded in March 2013 by, among others, community leaders, concerned citizens and residents of the Bahamas, international environmentalists and statesmen. Save The Bays' primary mission is to protect and preserve the spectacular Bahamian environment, to which I am deeply committed.

7. Since 1993, I have owned a residence known as "Point House" in Lyford Cay in the Bahamas. My property is adjacent to Peter Nygård's property in the Bahamas, which he refers to as Nygård Cay.

8. For the past several years, and continuing to this day, I have been the subject of a malicious smear campaign—waged through the press, over the Internet, and in staged protest marches—accusing me of repugnant crimes and activities. This wide-ranging attack campaign is based on inflammatory and malicious lies.

9. I confirm that the allegations made against me by this smear campaign, as detailed in the declaration of my counsel, Jenny Afia, are categorically false. In particular, there is no truth to the allegations summarized in Paragraph 73 of Ms. Afia's declaration and described in greater detail throughout Ms. Afia's declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York,
New York, on August 12, 2014.


LOUIS M. BACON